

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

**IN RE:**

**Chapter 13  
Case No. 15-11787**

**Alonzo Tyler  
Shawn Tyler  
Debtor (s)**

**Judge Price Smith**

**DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

Now come Debtors, by and through counsel, and respond as follows:

1. The claim rendering the plan infeasible is late and has not been allowed by the Court, and therefore, should not be paid by the trustee.
2. Without this claim, the plan remains feasible.

Wherefore, debtors pray this Court enter an order denying trustee's motion to dismiss and for such other relief as this Court deems just.

Respectfully submitted,

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/s/ Debra Booher  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically transmitted on or about December 7, 2016 via this Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice List:

U.S. Trustee at: (Registered address)@usdoj.gov  
Trustee, Mr. Craig Shopneck at: ch13shopneck@ch13cleve.com, cshopneck13@ecf.epiqsystems.com

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/s/ Debra Booher  
Debra E. Booher, #0067804